

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

IN RE:

HOLIDAY HAM HOLDINGS, LLC

Case No. 23-23313-MRH

Debtor.

Chapter 11, Subchapter V

**SUPPLEMENT TO MOTION WITH
NOTICE OF AUCTION SALE AND PROCEEDS AND LEASES TO
BE ASSUMED OR REJECTED**

Upon motion being filed by Holiday Ham Holdings, LLC, the Debtor-in-Possession (“Debtor”) on September 26, 2023, ECF #101)pursuant to 11 U.S.C. Sections 363 and 365 and Fed. Rule of Bankr. Proc. 4001 and 9014 (hereafter “Motion”) filing said Motion to Sell Substantially All of the Assets Owned by Holiday Ham Holdings, LLC, Free and Clear of Liens, Claims and Interests, with Liens Attaching to Proceeds of Sale, Outside the Ordinary Course of Business Pursuant to 11 U.S.C. Section 363 and Assumption and Assignment of Executory Contracts Pursuant to 11 U.S.C. Section 365 (the “Motion”) in the above named and numbered case. Objections and/or responses were filed to the Motion by United States Trustee for Region 8 (US Trustee), Pinnacle Bank, Subchapter V Trustee and Erinway Partners LP. Upon appropriate notice and hearing on October 18, 2023 and the Court entered an Interim Order (ECF #128). The Interim Order allowed auction to proceed on October 26, 2023 beginning at 9:00 a.m. to be held under terms with Jeff Morris and Morris Realty and Auction with provision there shall be a minimum bid of \$75,000 on each store or no less than \$150,000 total subject to final hearing to approve the proposed sale. Including any proposed assumption and assignment of leases or executory contracts to which Debtor is a party, to be held on Friday, October 27, 2023 at 11:00 p.m. before the Honorable Ruthie Hagan.

1. All liens attach to the proceeds with Pinnacle Bank have first and prior lien on said proceeds.
2. Counsel for Debtor attaches the Notice and Auction Contract that the stores are to be sold to Jose L. Flores (owner of 30 Margarita restaurants) for \$75,000 for Holiday Erin Store and \$100,000 for Holiday Ham Germantown for a total sales price of \$175,000 with a 10% buyers' premium to be paid to Morris Auction and Realty of \$17,500 for total of \$192,500.
3. Debtor requests after hearing that the auction and sales be approved with buyer's premium to be paid Morris Auction and Realty and sale is approved in accordance with the original Motion as well as both leases be assumed and assigned to Purchaser..

Respectfully Submitted,

/s/ Toni Campbell Parker

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Secured Creditors of Debtor

Twenty Largest Unsecured Creditors

All Creditors and Parties on Mailing Matrix